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**To:** "Wendy Cohen" <wcohen@waterboards.ca.gov>, "Bill Croyle" <wcroyle@waterboards.ca.gov>  
**Date:** 4/17/06 4:37PM  
**Subject:** waiver renewal

Wendy and Bill:

Given the considerable effort spent to date in preparing the irrigated lands renewal document, your willingness to work cooperatively with agriculture, and what I believe will be a very workable document, I wanted to share with you what I believe to be one of Farm Bureau's outstanding concerns, cost analysis.

In our November 5, 2005 letter, Farm Bureau made reference to, and included as attachments, the Los Angeles and Central Coast RWQCBs economic analyses of their proposed waiver programs. Farm Bureau has consistently maintained our desire to see an evaluation of the costs associated with, or related to, complying with the Irrigated Lands regulatory requirements. A significant amount of money and in kind contributions have been expended to date and we believe future compliance costs data is necessary to help properly ascertain the feasibility of implementing the Irrigated Lands Program and to evaluate the reasonableness of the program's requirements.

We understand that compliance costs will vary between groups and within groups, however, given the existing documents from the other RWQCBs, we believe that an adequate template exists to carry out this evaluation. Again, thank you for your efforts to date in working through several of the major program issues and I look forward to any questions you may have with respect to the costs analysis.

Regards,

John